

July 13, 2004

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Bureau of Land Management, Alaska Office
Attn: Northeast NPR-A Planning Team
222 West Seventh Avenue
Anchorage, Alaska 99513-7599

Dear Planning Team,

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Preference

Please accept these comments on the proposed amendment to the oil and gas leasing plan for the Northeast National Petroleum Reserve Environmental Impact Statement. I am especially concerned about the impact the Bureau of Land Management's proposal would have on the area around Teshekpuk Lake, one of the most unique and important wetlands in the entire Arctic.

2

I urge you to adopt Alternative A, the "No Action" alternative, because it would maintain protection for the entire Teshekpuk Lake Surface Protection Area. This extraordinary ecosystem provides critical habitat for molting geese and nesting habitat for Steller's eiders, northern pintails, yellow-billed loons and other species. It also supports a vitally important caribou herd that the Inupiat natives have depended on for their subsistence for millennia. The potential impacts of oil and gas exploration and development the area could be devastating to the whale, caribou, waterfowl, and fish that the Nusquit rely on for subsistence. While the BLM does have a mandate under EPCA and the President's National Energy Policy to exploit the nation's oil resources, it also must comply with the spirit of NEPA, President Clinton's Environmental Justice Order, and the ESA. The environmental resources that the Nusquit subsist on are crucial to their economy, culture, and very identity. Alternative B threatens the BLM's relationship with the tribe, as some members feel that exploitation of the area will be a "breach of faith." The EIS admits that Preferred Alternative B will impact the subsistence resources, but proposes speculative alternatives to mitigate the harm. The BLM should further and continually consult and communicate with the Nusquit to truly mitigate the harm and honor its commitment to the tribe. The BLM has also inadequately considered the impact on unknown cultural resources, as only 2-3% of the area has been surveyed for artifacts.

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Consultation

The EIS for this project also reveals that Preferred Alternative B could harm and potentially jeopardize the existence of the Bowhead Whales, and Steller's and Spectacled Eider, who are protected by the ESA. The BLM should engage in Section 7 consultation with FWS about potential impacts to these species. The potentially detrimental effects of the project on the Bowhead Whales should be further investigated, particularly the potential impact of an oil spill and the effects of sound on the Whales; the ESA and MMPA should make the BLM reconsider interfering with the whales' migration path. The increased air traffic, water alterations, habitat loss, and mortality that the EIS states will be "additive" impacts of the project on the Eiders are also incongruent with the requirements of the ESA. The EIS states that Alternative B will have greater impacts on both the whales and eiders because of the greater area used for exploration, and some area used for development. The long-term effects on the species, particularly the speculation that the Eiders will be displaced and find adequate habitat defy the ESA.

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Traffic

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The potentially devastating impacts of an oil spill must be further considered. It is troublesome that Exxon is an oil company interested in exploiting the area. The company's record of environmental stewardship in Alaska is atrocious, as the devastating effects of the Valdez spill continue to the present day. The company has also showed that it is unwilling to truly atone for the spill as it is still delaying paying the judgment against it by using appellate procedures. It is difficult to trust such a corporation to successfully comply with the BLM's proposed mitigation measures.

7

Eighty-seven percent of the northeastern reserve is already open to oil and gas companies for leasing. In the five years since the original 1998 northeast plan, additional information and analyses have been accumulated that point toward significant impacts on fish and wildlife if more of this fragile area is opened. It would be a huge mistake to risk the internationally significant ecological resources of Teshekpuk Lake for a short-term supply of energy, especially when we know that the United States cannot drill its way to energy independence.

8

Again, I urge you to choose Alternative A, the "No Action" alternative, to protect the reserve's irreplaceable wildlife, wilderness and subsistence values for future generations.

Sincerely,

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